

**Modifications to Process and Standard Operating Procedures**

Modifications have been made to ensure LCPFACs are not imparted during fluorination of HDPE packaging

1. **Temperature Changed:** The temperature set point has been changed from [REDACTED]
2. **Wares Loading Procedure Unchanged:** Inhance has not modified its wares loading procedure.  
[REDACTED]
3. **Chamber Door Close Procedure Unchanged:** [REDACTED] C
5. **Fluorination Process Parameters Changed:** Monitoring of process parameters has been enhanced to [REDACTED]
6. **Fluorine Addition Protocol Changed:** We have modified the amount of fluorine gas used in the procedure as described as shown below:

The fluorine addition has been modified from (shown below, also submitted to EPA in Feb 2021)

mmHg of pure Fluorine	
Item < 2 oz	
2 oz ≤ Item < 8 oz	
8 oz ≤ Item < 12 oz	
12 oz ≤ Item < 40 oz	
40 oz ≤ Item < 5 Gal	
Item ≥ 5 Gal	

to this

mm Hg pure Fluorine and Packaging Size	
Packaging Size (oz)	Level of Fluorination
<1	
1.99	
2	
8	
12	
20	
32	
40	
64	
128	
160	

320	
640	
3840	
17280	
100000	

The amount of fluorine to be added for the treatment of HDPE packaging has been refined a number of ways:

- a. [REDACTED]

7. **Process Time Changed:** We have modified the process time set-point from [REDACTED]
8. **Process Time Monitoring Changed:** We have installed time clocks and strobe lights to more tightly control treatment time through visual and parametric monitoring
9. **Tail Purges Unchanged:** [REDACTED]
10. [REDACTED]
11. **Data Capture Protocol Changed:** [REDACTED]
12. [REDACTED]
13. **LCPFAC Data Gathering Changed:** We have implemented a program of periodic sampling across all locations to ensure continued absence of LCPFACs (since Inhance Technologies became aware of the issue, we have committed to understanding and eliminating LCPFAC from our process, we will continue to monitor)
14. **Product Performance Unchanged:** The foregoing changes were made without impacting the product performance attributes (i.e., barrier properties, recyclability, shelf life, etc. This was confirmed through exhaustive testing)
15. **Process Compliance:** We continuously monitor all production data on a daily basis